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PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BOX AF

In re the application of

de Jong et al.

Application No: 09/275,727

Filed: March 24, 1999

For: STORAGE AREA NETWORK
ADMINISTRATION

COPY OF PAPERS
ORIGINALLY FILED

Examiner: Tran, M

Art Unit: 2174

Attorney Docket No: ADAPP091A

Date: May 30, 2002

☐ Duplicate for
fee processing

Commissioner for Patents
Washington, DC 20231

CERTIFICATE OF MAILING

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Neely J. Weldy

RECEIVED

Sir:

Transmitted herewith is an office action response in the above-identified application.

The fee has been calculated as shown below.

JUN 21 2002

Technology Center 2100

Claims

	Remaining After Amendment	Highest Previously Paid For	Present Extra	SMALL ENTITY RATE FEE	OR	LARGE ENTITY RATE FEE
TOTAL CLAIMS	20 -	20	0	X09 = \$	OR	X18 = \$
INDEP CLAIMS	04 -	04	0	X42 = \$	OR	X84 = \$
[] Multiple Dependent Claim Present and Fee Not Previously Paid				\$140		\$280
TOTAL				\$ _____		\$ 0

- ☐ Applicant hereby petition for a _____ month extension of time to respond to the outstanding Office Action.
- ☒ Applicant believes that no Extension of Time is required; however, if it is determined that such an extension is required, Applicant hereby petitions that such an extension be granted and authorize the Commissioner to charge the required fees for an Extension of Time under 37 CFR 1.136 to Deposit Account No. 50-0805
- ☐ Enclosed is our Check No. _____ in the amount of \$ _____ to cover the extension of time fee.
- ☒ If the required fees are missing or any additional fees are required to facilitate filing the enclosed response, please charge such fees or credit any overpayment to Deposit Account No. 50-0805 (Order No. ADAPP091A). A copy of this sheet is enclosed.

Respectfully submitted,
MARTINE & PENILLA, LLP

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Response Under 37 C.F.R. § 1.116
Expedited Procedure
Examining Group 2174
PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

#12

In re the application of

de Jong et al.

Application No: 09/275,727

Filed: March 24, 1999

For: STORAGE AREA NETWORK
ADMINISTRATION

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) Examiner: Tran, M

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Technology Center 2100

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Signed: _____

Neely Weldy

RESPONSE TO OFFICE ACTION

Commissioner for Patents
Box AF
Washington, DC 20231

Dear Sir:

In response to the Final Office Action dated April 2, 2002, the Applicant hereby submits this paper within the time limit set for response, which extends to July 2, 2002.

Please enter this response.

RESPONSE

This paper is in response to the Final Office Action of April 2, 2002. This response is provided within the two month period, extending to June 2, 2002, from the date of the Final Office Action. Claims 1-18 and 20-21 remain pending in this case.

Rejection under 35 U.S.C. § 103

Claims 1, 2, 14-17 and 18 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over Wollrath et al. ("Wollrath") (U.S. Pat. No. 6,263,350) in view of Smith et al. ("Smith") (U.S. Pat. No. 5,829,053) and further in view of Ofer et al. ("Ofer") (U.S. Pat. No. 5,890,204). These rejections are respectfully traversed.

Claims 3-10, 13, and 20-21 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over Wollrath in view of Smith further in view of Ofer and further in view of Leong et al. ("Leong") (U.S. Pat. No. 6,269,398). These rejections are respectfully traversed.

Claims 11-12 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over Wollrath in view of Smith further in view of Ofer further in view of Leong and further in view of Madsen et al. (U.S. Pat. No. 6,151,620). These rejections are respectfully traversed.

To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references or in the knowledge generally available to one having ordinary skill in the art, to combine the references. Additionally, the references when combined must teach or suggest all the claim limitations. As discussed below, the Office has not established a *prima facie* case of obviousness because there is neither suggestion nor motivation, in either the references or in the knowledge of one having ordinary skill in the art at the time of the invention, to have combined the references in the manner proposed. Furthermore, the references when combined do not teach or suggest all of the claim limitations.

Wollrath teaches a method for handling the usage of resources, namely memory resources, in a distributed computing environment. When multiple computer programs or objects use memory to complete an operating task, the memory is allocated to that

computing entity until it no longer needs the memory. However, in some cases, the allocated memory is not de-allocated and made available to other computing entities. For this reason, Wollrath uses a method for leasing storage locations in a pre-configured network computing system. The storage location leasing method includes a receipt of a lease request, a grant or denial of a lease request, a receipt of a lease modification request, and a reclamation of a leased storage location. The storage location leasing method ensure that memory resources get de-allocated when no longer in use by computing entities. The storage location leasing method is required to be implemented on a network computer system that has been pre-configured without need for further configuration management.

Smith teaches a method for memory management by nesting partitioned storage devices that have separate partition managers and device drivers to create a plurality of virtual storage devices. The separation of partition managers and device drivers functions to allow for the nesting of partition formats and avoids the replication of partitioning codes. In an exemplary discussion, Smith teaches that the physical storage media may include one or more RAID arrays.

Ofer teaches the use of a limited graphical user interface (GUI) for determining the status and configuration of a mass storage system. Ofer also teaches the use of a limited GUI to modify the interconnections between ports associated with a host computer and a disk array. Specifically, the GUI taught by Ofer includes "... a pictorial representation of interconnections between ports connected to the disk array, enabling a user to modify the pictorial representation at the host to reconfigure the connections to the host computer and disk array ..."

Leong teaches methods for discovering "router" entities in order to create graphical user interfaces. The graphical user interfaces can then be used to generate icons for viewing aspects of the routers. Specifically, Leong (Figure 4, Items 441, 442, and 443) teaches the

use of GUI buttons to link to views of router interface configurations, router fault statistics and history, and router interface performance statistics and history. In teaching these methods, Leong discloses methods for discovering connections of the routers to better interface with a wider area network.

With respect to Claims 1 and 18, Wollrath does not teach a storage area network management and configuration system. Rather, the storage location leasing method taught by Wollrath is disclosed as being implemented on a networked computer system that has already been configured. Although Wollrath generally teaches the networking of computers, the reference does not teach the use of a client computer to access a storage enclosure connected to a server component to enable full configuration and management.

Also with respect to Claims 1 and 18, Smith does not teach the use of an enterprise network or a storage area network management and configuration system. Smith does teach the use of a RAID device in an exemplary discussion of the disclosed method for memory management. However, this teaching of RAID device usage in the context of a memory management method neither teaches nor suggests the methods for RAID device configuration and management as claimed in the present invention. Furthermore, Smith does not teach the use of a GUI having graphical representations and icon links to configuration tools for controlling a RAID device.

The GUI disclosed in Ofer does not include icon links to configuration tools for controlling a RAID array of disks. Rather, Ofer teaches a limited GUI based on a pictorial representation of interconnections which allows determination of the status and configuration of a mass storage system and performance of modifications to the mass storage system that are limited to changing the interconnection configuration. The icon links to configuration tools which allow a user to remotely configure drives, as claimed in

the invention, differ in both form and function relative to the pictorial representations of interconnections taught by Ofer.

The references of Wollrath, Smith, and Ofer must be viewed without the benefit of impermissible hindsight vision afforded by the claimed invention. Neither the teachings nor the nature of the problem solved in either Wollrath, Smith, or Ofer, or the combination thereof, motivate or suggest to one of ordinary skill in the art at the time of the invention to combine the reference teachings in a manner that would make the claimed invention obvious. Furthermore, the unmotivated combination of Wollrath, Smith, and Ofer fails to teach all of the claimed features of Claims 1 and 18. For at least these reasons, the Applicants respectfully request that that rejections of independent claims 1 and 18 be withdrawn. For at least the same reasons, the Applicants respectfully submit that dependent claims 2, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, and 20 are patentable over the cited art of record.

With respect to Claims 3 and 21, Leong does not teach the array builder link as claimed in the present invention. The array builder link of the claimed invention provides selection tabs to allow array building from an array template or from scratch. Leong Figure 4, Items 441, 442, and 443, as referenced by the Office for a basis of rejection of Claim 3, do not teach or suggest the array builder icon link or associated selection tabs as claimed in the present invention. Actually, Leong Figure 4, Items 441, 442, and 443, refer to GUI buttons for linking to views of router interface configurations, router fault statistics and history, and router interface performance statistics and history. A way for building an array of disks as claimed in the present invention is completely unrelated to router interface configurations, statistics, and history. Furthermore, the act of viewing a configuration, set of statistics, or history related to a router interface neither teaches nor suggests the creation

of an array of disks as facilitated by the array icon builder link and associated selection tabs as claimed in the present invention.

With respect to Claim 21, Leong neither teaches nor suggests the use of a GUI control for enabling a user to remotely configure drives of a storage enclosure. Furthermore, Leong neither teaches nor suggests that a GUI control include one or more of an array modifier icon link, an enterprise monitor icon link, an array builder icon link, an event notifier icon link, an unconfigured hardware icon link, a templates icon link, and an enterprise icon link. Leong, Column 11, Lines 6-25, as referenced by the Examiner for a basis of rejection of Claim 21, refer to a router status icon whose function is to display a particular color based on the router status (e.g., green=normal, red=problem, etc ...). Neither a router, a router status icon, or an icon display color is related to the claimed invention. Therefore, Leong, Column 11, Lines 6-25, neither teach nor suggest any feature of the claimed invention.

To the extent that Claims 3 and 21 include features of Claims 1 and 18, the previous arguments rebutting the establishment of a *prima facie* case of obviousness against Claims 1 and 18 based on Wollrath, Smith, and Ofer also apply to Claims 3 and 21. The references of Wollrath, Smith, Ofer, and Leong must be viewed without the benefit of impermissible hindsight vision afforded by the claimed invention. Neither the teachings nor the nature of the problem solved in either Wollrath, Smith, Ofer, or Leong, or the combination thereof, motivate or suggest to one of ordinary skill in the art at the time of the invention to combine the reference teachings in a manner that would make the claimed invention obvious. Furthermore, the unmotivated combination of Wollrath, Smith, Ofer, and Leong fails to teach all of the claimed features of Claims 3 and 21. For at least these reasons, the Applicants respectfully request that that rejections of independent claims 3 and

21 be withdrawn. For at least the same reasons, the Applicants respectfully submit that dependent claims 4 and 5 are patentable over the cited art of record.

Accordingly, a notice of allowance is respectfully requested. Alternatively, the Applicants submit that the claims, in view of the art of record, are in condition for Appeal. If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6903. If any other fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ADAPP091A). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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